

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHARLES TILL,

**Plaintiff,**

**NATIONAL GENERAL ACCIDENT AND  
HEALTH INSURANCE COMPANY,**

**Defendant,**

**No.: 21-CV-1256**

**Judge Thomas M. Durkin**

**DEFENDANT'S RULE 26(A)(1) INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant NATIONAL HEALTH INSURANCE COMPANY (incorrectly sued as “NATIONAL GENERAL ACCIDENT AND HEALTH INSURANCE COMPANY”) hereby provide the following initial disclosures:

A. The name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

**DISCLOSURE:**

1. Charles Till  
329 S. Lincoln Street  
Westmont, IL 60559

Mr. Till is expected to testify about his medical conditions which existed within the 12 months immediately preceding the Effective Date of the policy including conditions leading to his hospitalization on March 14, 2018 and the allegations contained in Plaintiff's Amended Complaint.

2. Valerie Peterson  
Director of Underwriting and Medical Management  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Peterson is expected to testify about the Pre-Existing Condition review process and subsequent determination made on the claims and bases therefore.

3. Elizabeth Dummer  
Medical Risk Analyst  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Dummer is expected to testify about her background as a nurse, her review of the claims for the grievance panel, and conclusions she reached concerning the existence of Pre-Existing Conditions.

4. Dr. Charlotte Heidenreich  
Heidenreich Medical Consulting  
4753 N. Larkin St.  
Whitefish Bay, WI 53211

Dr. Heidenreich is expected to testify regarding her review of claim and conclusions concerning existence of Pre-Existing Conditions.

5. Marianne Pavach, M.D.  
MCMC LLC  
1451 Rockville Pike  
Ste 440  
Rockville, MD 20852

Dr. Pavach is expected to testify regarding her review of claim and conclusions concerning existence of Pre-Existing Conditions.

6. Dana Mattice  
Risk Management  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Mattice would testify about her involvement in claim process.

7. Amanda Kowalinski  
Risk Management Analyst  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Kowalinski would testify about her involvement in claim process.

8. Jeff Eide  
Manager, Account Management  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Mr. Eide was a voting member at the grievance panel and would testify about his determination.

9. Casey Lanto  
Product Manager II  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Lanto was a voting member at the grievance panel and would testify about his determination.

10. Jillaine Kelley  
Manager, Clinical Risk Management  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Kelley is nurse and was the medical advisor at the grievance panel.

11. Teresa Cage  
Sr. Customer Resolution Specialist  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Cage coordinated the grievance panel and would testify about her role in the process.

12. Morgan McCreary  
Legal Counsel  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Mr. McCreary sits on the grievance panel as a legal advisor and would testify about his role.

13. Jane Snider  
Customer Resolution Specialist  
National General Management Corp.  
1515 N. Rivercenter Drive  
Suite 135  
Milwaukee, WI 53212

Ms. Snider would testify about her role in handling the correspondence side of the appeal (grievance panel), gathering all the documents, coordinated the medical review, and drafting letter after grievance panel made their determination.

14. Denise Bell  
Client Advocate  
Meritain Health, Inc.  
1405 Xenium Lane North, Suite 140  
Minneapolis, MN 55441

Processing of claims.

12. Jane Rudenske  
BPO Client Advocate  
Meritain Health, Inc.  
1405 Xenium Lane North, Suite 140  
Minneapolis, MN 55441

Processing of claims.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defense, unless solely for impeachment.

**DISCLOSURE:**

- Insurance policy 671272722;
- Medical records from Advocate Good Samaritan Hospital dated March 14, 2018 produced to plaintiff's counsel on April 12, 2021;
- Reports of Elizabeth Dummer and Dr. Charlotte Heidenreich produced to plaintiff's counsel on April 12, 2021.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 and documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

**DISCLOSURE:**

Defendant does not currently claim any damages in relation to this action.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**DISCLOSURE:**

Not Applicable.

Respectfully submitted,

/s/ Dennis A. Berg

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*Attorney for National Health  
Insurance Company*

**CERTIFICATE OF SERVICE**

The undersigned attorney, hereby certifies that on June 14, 2021, a copy of the foregoing **DEFENDANT'S RULE 26(A)(1) INITIAL DISCLOSURES** was filed electronically. Notice of this filing will be sent to the parties named below by first-class mail, postage prepaid. Parties able to received electronic filing will also receive a copy electronically:

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